



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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NOV 26 2008

Ref: 8EPR-N

Ms. Sally Wisely
State Director
BLM Colorado State Office
2580 Youngfield Street
Lakewood, Colorado 80215

Re: Little Snake Draft EIS and Resource
Management Plan and Additional Air
Quality Information to the Draft EIS,
Craig, Colorado, CEQ # 2007004

The United States Environmental Protection Agency, Region 8 (EPA), has reviewed the Bureau of Land Management's (BLM) Additional Air Quality Impact Assessment to support the Draft Environmental Impact Statement (DEIS) and Resource Management Plan (RMP), and the DEIS, for the Little Snake Field Office, dated September 2008. We offer these comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(c) and EPA's authority under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

These comments supplement our August 16, 2007 letter to you. That letter provided comments on the DEIS with the exception of air quality comments, and reserved the rating for the overall DEIS. This letter provides the additional comments on the air quality analysis and impacts, and EPA's rating. A copy of EPA's August 16, 2007 letter is attached, as well as an explanation of our ratings.

The DEIS evaluated many different land management decisions, including oil and gas and mineral deposit management, range management, wilderness area and wild and scenic river designation analyses, and wildlife management. Today's comments on the air quality analysis are relevant to the oil and gas activities projected for the Little Snake Field Office.

EPA thanks BLM for its decision to undertake additional air quality analysis. We wish to note, however, that the time and cost associated with the additional analysis exceeded what we would normally expect for this type of analysis. BLM's consultant on this project made several preliminary errors (e.g., placement of the wells for modeling, incorrect mixing depth, and incorrect meteorology information) that added to the resources necessary to complete the study.

The final analysis, however, closely followed the approach BLM and EPA discussed and documented in a November 2007 modeling protocol. EPA believes the overall analysis appears

to be technically sound, based on reasonable estimates of future development using geophysical data and current/historical development patterns. We believe the analysis strengthens the environmental impact study and results in a more complete disclosure of future impacts. Our comments focus on the presentation of results and future steps.

Results of the air quality modeling: The Air Quality Impact Assessment found that none of the four action alternatives would result in exceedences of air quality standards. It did find, however, that there were predicted changes to visibility. Alternatives A, B and C (C is the preferred alternative) show between 1 and 4 days of additional visibility impairment at Mount Zirkel Wilderness (a Class 1 area) and between 3 and 5 days of impairment at Dinosaur National Monument (a Class II area). The Air Quality Impact Assessment, however, is using lower numbers for additional visibility impairment conclusions. This is because two methods were used: BLM's FLAG Spreadsheet Screening Method, which predicted the higher numbers, and BLM's Refined FLAG spreadsheet method. These methods differ from Calpuff Method 6, which EPA, the States, and Federal Land Managers use in the regional haze program and that EPA prefers for use in NEPA air quality assessments. The BLM screening methodology is very similar to Method 6, and EPA believes that this methodology provides a more accurate and reliable method for estimating the plan's visibility impacts than the "BLM refined" method. Thus we recommend using the higher numbers generated by the screening methodology when considering the need for any mitigation measures. Table 5-5 should include the results of the BLM screening methodology, which BLM has developed, from Table 3-16 in the technical support document. In future Air Quality Analysis EPA prefers standard CALPUFF Method 6 be applied for predicting number of days of visibility impairment.

Cumulative Impacts: The Air Quality Impact Assessment uses a partial cumulative impact assessment approach, in that it included projected oil and gas wells within the borders of the Little Snake Field Office on land owned by the State, the Federal government and private entities, but it did not assess the impacts from development outside the Field Office borders, such as the White River, Kremmling, Glenwood Springs, Vernal, and Rawlins Field Offices, and the Oil Shale and Tar Sands Programmatic EIS. We suggest that the impacts of other surrounding areas be addressed at some point, perhaps in the White River Field Office air quality analysis, most immediately. We also recommend that the Final EIS note that such analysis is not included due to timing issues, and that the actual impacts may be greater than described in the Final EIS.

In addition, in section 5.5 of the analysis, the text indicates that cumulative Class I visibility impacts from this project and other sources in the region will be lower than in the recent past owing to significant SO₂ and NO_x emission reductions that have occurred at the Craig and Hayden Power Plants. While this is true in the regional haze program, future progress is judged based on 2000-2004 visibility monitoring data and most of the controls on these plants were installed before the end of this period. Thus, the reductions may not be fully creditable for State regional haze SIP planning purposes. Moreover, the national visibility goal is to reach natural background conditions by 2064, and the future predicted contributions to visibility impairment from this plan could affect Colorado's ability to meet that goal at Mount Zirkel and other nearby Class I areas.

Mitigation: The assumptions used in the modeling for engines should be required as a condition of permits. The assumptions were that the first year, all Tier 2 engines would be used, and that over the next few years, 20% of engines would be Tier 4 engines, and by 2015, all engines would be Tier 4. Note that even with this assumption of all Tier 4 engines, the plan is showing air quality impacts. Please assure that these assumptions become requirements, embodied in the ROD and in all permits. The list of examples of Best Management Practices (BMPs) included in the Additional Information document (page 21) should be included in the ROD as well, so that at the APD or field development proposal stage, operators are on notice that these BMPs, or a subset thereof, will be required.

Selection of Alternative D, and the Environmentally Preferred Alternative: The level of impairment predicted for Alternatives A, B, and C is higher than what is predicted for Alternative D. The selection of Alternative D (75% of the total number of wells of Alternative C) would reduce visibility impacts to less than one day, and require less mitigation than other alternatives. Therefore, EPA suggests that Alternative D be considered as the preferred alternative.

In a related matter, the DEIS contains a general statement that BLM would minimize, within its scope of authority, any emissions that could add to atmospheric deposition, cause violations of air quality standards, or degrade visibility, and consider on a case by case basis requirements such as flareless well completions. EPA recommends that the RMP more clearly set forth, at this stage, a commitment to implementing the mitigation strategy presented in Section 5.6 of the Additional Air Quality Impact Assessment document for all oil and gas activity within the RMPPA.

Additional Technical Air Quality Comments (from the original DEIS):

- *Page 3-11:* In the last paragraph on page 3-11, BLM states that the Colorado Department of Public Health and the Environment (CDPHE) has adopted the National Ambient Air Quality Standards (NAAQS) "therefore there are no ambient air quality standards specific to Colorado." This statement should be revised. The CDPHE has adopted standards which differ from the NAAQS. We recommend consulting with the CDPHE regarding interpretation of the Colorado standards.
- *Table I-6 of Appendix I:* This table correctly lists the annual 24-hour primary and 3-hour secondary NAAQSs for sulfur dioxide (SO₂) in parts per million (0.03, 0.14 and 0.50, respectively). However, the conversion of these standards to parts per billion (ppb) presented in the table does not appear to be correct. Please revise the table or explain the apparent discrepancy.
- *Page I-9 of Appendix I:* This page refers to ozone monitoring on the Ute Mountain Ute Reservation. We believe this reference is referring to the stations operated at Bondad and Ignacio on the Southern Ute Reservation. If this is correct, please revise.
- *Ozone Impacts:* EPA recommends that the EIS and ROD state how BLM would mitigate potential ozone impacts, if it becomes a problem, as it has in neighboring areas.
- *Visibility:* The visibility table shows visibility impairment greater than 1.0 dv in two Class I areas – the Black Canyon of the Gunnison and Mt. Zirkel Wilderness (Table 4-59, page 4-229). However, the text below the table indicates that there is an impact greater than

1.0 dv in only one Class I Wilderness area, the Black Canyon of the Gunnison. This inconsistency should be corrected, and the table and section should reflect the new analysis on visibility.

EPA Rating of the DEIS

EPA believes BLM did an admirable job of analyzing the air quality impacts of this Plan. We believe our August 16, 2007 letter raised significant concerns on sage grouse impacts, water quality impacts, and the Vermillion Basin Leasing Plan, mentioned further below. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives analyzed in the DEIS, EPA is rating this DEIS as EC-2 (Environmental Concerns – Insufficient Information). An “EC” signifies that EPA’s review of the DEIS has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the selected alternative or application of mitigation measures that can reduce the environmental impact. In this case, the mitigation described above should be implemented to avoid visibility impairment, and impacts to sage grouse should be further addressed. The “2” signifies that the DEIS does not contain sufficient information for the EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. In this case, the DEIS does not fully analyze the impacts to sage grouse, the adaptive management approach, the fragile nature of the sagebrush ecosystem and the distinct possibility that activities conducted in the RMPPA may result in irreversible damage to sage grouse habitat. It also does not address the potential impacts to 303(d) listed streams, impacts to outstanding natural resource waters, and demonstrate protection of the natural and scenic values of the Vermillion Basin. EPA’s comments and this rating apply to the preferred alternative selected by BLM.

Again, I would like to thank BLM for its efforts and attention to the appropriate level of air quality analysis on this project. My staff would particularly like to thank Jeremy Casterson for keeping EPA informed of the ongoing progress on the supplemental analysis. If you have any questions on these comments, please contact me, at (303) 312-6004 or Deborah Lebow Aal of my staff at (303) 312-6223.

Sincerely,



Larry Svoboda
Director, NEPA Office

Enclosures (2)

cc: Jeremy Casterson, Little Snake Field Office, BLM
Jim Martin, Colorado Department of Public Health and the Environment
Rick Cables, U.S. Forest Service

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

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AUG 16 2007

Ref: 8EPR-N

Ms. Sally Wisely
State Director
BLM Colorado State Office
2580 Youngfield Street
Lakewood, Colorado 80215

Re: Little Snake Resource Management Plan
Draft EIS, Craig, Colorado, CEQ # 2007004

Dear Ms. Wisely:

The United States Environmental Protection Agency, Region 8 (EPA), has reviewed the Bureau of Land Management's (BLM) Draft Environmental Impact Statement (DEIS) for the Little Snake Resource Management Plan (RMP). We offer these comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(c) and EPA's authority under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Our comments are based on your letter to EPA received on August 3, 2007. The letter states that BLM will conduct supplemental air quality analysis and will use modeled results to help analyze and disclose the direct, indirect, and cumulative air quality impacts from potential oil and gas developments. EPA and the public will have an opportunity to review and comment on the supplemental analysis for the DEIS. EPA Region 8's comments on impacts other than air quality are set forth in the enclosure to this letter. EPA's comments on air quality will be provided as described under "Next Steps," below.

BLM's Little Snake Field Office (LSFO) includes approximately 4.2 million acres of land in Moffat, Routt and Rio Blanco Counties, in Colorado. Within that area, the LSFO administers the Little Snake Resource Management Plan Planning Area (RMPPA), which consists of approximately 1.3 million acres of public land surface and mineral estate and 1.1 million acres of federal mineral estate where the surface is privately-owned or state-owned. The current Little Snake RMP was approved in 1989, and has been amended three times. This DEIS evaluates replacing the existing RMP in its entirety, and covers many different land management decisions, including oil and gas and mineral deposit management, range management, wilderness area and wild and scenic river designation analyses, and wildlife management.

The DEIS describes four alternative plans. Alternative A, which is the no action alternative, continues existing management; Alternative B provides an emphasis on the development of resources; Alternative C, called the Conservation Alternative, is the preferred

alternative; and Alternative D has an emphasis on preservation. Alternatives B and C both assume the addition of up to 3,031 oil and gas wells in the RMPPA with up to 49,261 acres disturbed before reclamation.

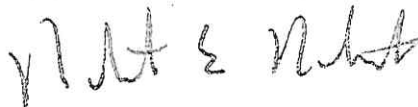
Next Steps

EPA is currently providing our comments on the DEIS with the exception of comments on the DEIS air quality impacts analysis. EPA's comments on air quality impacts from potential oil and gas development and on the supplemental analysis of air quality impacts will be reserved until BLM provides the supplemental air quality analysis for public comment. EPA will provide a rating of the overall DEIS at the time we provide our comments on the supplemental air quality analysis.

EPA and BLM will discuss the appropriate air quality analysis to be done. My staff at EPA Region 8 will work with your staff on a time frame provided by BLM to expeditiously complete the supplemental air quality analysis.

I would like to thank you for taking the time to meet with me concerning the appropriate level of air quality analysis on this project, and my staff would like to thank Jeremy Casterson and Tim Novotny for providing EPA staff a tour of the LSFO, and background on the subjects covered by the DEIS. In addition, the staff at the BLM Colorado Office has been helpful in working with us on this project. If you have any questions on these comments, please contact me or have your staff contact Larry Svoboda, Director of the NEPA Program at 303.312.6004.

Sincerely,



Robert E. Roberts
Regional Administrator

Enclosure

cc: Jeremy Casterson, Little Snake Field Office, BLM
Tim Novotny, Little Snake Field Office, BLM
Jim Martin, Colorado Department of Public Health and the Environment
Rick Cables, U.S. Forest Service

**Little Snake Resource Management Plan
Draft EIS
EPA's Comments other than Air Quality**

Range of Alternatives Analyzed

- EPA is concerned with BLM's decision to eliminate from full analysis a phased development alternative to the proposed oil and gas activities. The DEIS indicates that phased leasing would cause delays in production of energy resources, delay royalties to the Federal government, and not take into account supply and demand economics. BLM also states that a phased leasing regime would result in additional decision-making burdens for BLM. EPA acknowledges these challenges. However, considering that the project may cause significant air quality and wildlife impacts, EPA recommends that the DEIS contain a full analysis of phased development alternative, or more fully explain why a phased development alternative was eliminated from full analysis. Detailed consideration would provide the decision-maker with important information on approaches to mitigating environmental impacts in areas with high wildlife habitat and scenic values.
- A phased development alternative can be defined in a number of ways including temporal and geographic development. EPA recommends analysis of a geographically-phased development alternative. EPA is willing to assist you in defining a reasonable phased development alternative and we recommend that you contact the Montana State BLM office for recent experiences in this matter.

Sage Grouse

- EPA encourages BLM to continue to coordinate with the U.S. Fish and Wildlife Service (FWS) and the Colorado Division of Wildlife, to assess whether the proposed Plan will provide an effective means of improving the condition of the sage grouse and its habitat, to identify the best available science, to develop effective adaptive management strategies and a reclamation standard that is more appropriate for sage grouse, and to provide adequate information on these issues in the EIS. The DEIS articulates a goal of improving the condition of special status species. It is not clear from the DEIS whether the Plan will, in fact, improve the condition of the sage grouse. The adaptive management strategy does not explain how the strategy would work to make adjustments if impacts to sage grouse are found. It is not clear how the appendices to the DEIS on adaptive management measures (Appendices A and M) would apply in the context of the Plan outlined above. The adaptive management plan appears to be missing a commitment to funding a monitoring plan, a protocol for the monitoring plan, and clarity on what would be done if the monitoring triggers indicators showing a decline in sage grouse populations. Recognizing that the science continues to emerge on this issue, EPA recommends further analysis of potential impacts to sage grouse.
- The proposed Plan should reference and address wildlife studies conducted in the Pinedale Anticline area. These studies found that male counts on sage-grouse leks that were heavily impacted by gas wells declined 51% from one year prior to well

development in 1999 through 2004 (Holloran, 2005). Further results of the long-term study on effects of wellfield development to greater sage-grouse lek attendance indicate that the .25 mile buffer surrounding leks, within which surface disturbance would be avoided, is insufficient to maintain function of lek habitats due to wellfield activities and associated noise (Holloran, 2005 and Ecosystem Research Group, 2006).

- It is not clear what the impacts will be to the sage grouse if some lessees opt not to follow the plan and are not restricted to 5% disturbance areas but have seasonal time constraints in which they can operate, and some lessees opt for the plan, in which case they can drill year round. It is unclear how these two options work together and what the impacts would be on the sage grouse.
- EPA recommends that after consultation with the FWS and the Colorado Division of Wildlife, the BLM may need to describe the projected cumulative impacts to the sage grouse from the proposed development and other reasonably foreseeable projects in surrounding areas as part of its cumulative impact analysis on wildlife. The cumulative impact analysis should provide more information on the current status of the sage grouse, a special status species for BLM, at present, and projected impacts to the sage grouse. Recent scientific data for the area should be cited and considered.

Water Quality

- *303(d) listed streams:* There appears to be information missing in the DEIS on protecting 303(d) listed stream segments from further degradation. There also is a discrepancy between the TMDL listed streams in the DEIS and EPA's database. EPA's Clean Water Act section 303(d) database for the 2006 cycle identifies two segments in the LSFO that are listed (meaning they are impaired waters requiring Total Maximum Daily Loads). Dry Creek below Seneca is listed for Se and is included in the DEIS. First Creek below Second Creek, Elkhead Creek below First Creek, is listed as impaired for e.coli, but is not listed in the DEIS. An additional segment, Stagecoach Reservoir, is listed in the DEIS, but our information shows it is on the CWA section 305(b) list as a water body of concern, but is not a 303(d) listed water. This should be corrected.
- *Outstanding Waters:* There are Outstanding National Resource Waters in the wilderness areas around the LSFO which should also not be degraded. EPA recommends that the EIS address whether these waters will be impacted by activities covered by the RMP.
- *Surface area disturbance from oil and gas wells:* The DEIS uses for analysis purposes over 3,000 oil and gas wells with projected impacts to 49,261 acres (before reclamation) which is a larger disturbance area per well than we have seen in other EISs. For example, the Pinedale Anticline Oil and Gas Exploration and Development Project reported 4,399 natural gas wells on 12,278 acres of new disturbance. EPA recommends that the EIS include additional discussion of opportunities to further avoid and minimize the extent of disturbance in the Little Snake Resource Area, and explain whether there will be mitigation measures in place to reduce the potential water quality and other resource impacts associated with the large area of disturbance. EPA also suggests that the EIS include analysis of whether directional drilling, for example, which could greatly reduce the footprint of these activities, is a feasible practice in this area.
- *No surface occupancy requirement for perennial waters:* The preferred alternative requires no surface occupancy stipulations applied up to one-quarter mile from perennial

water sources, if necessary (DEIS page ES-7). The DEIS does not explain, however, how this distance was selected. EPA recommends that the EIS include a discussion of how application of this provision will be protective of water quality, and whether, in some cases, additional protection may be necessary.

Vermillion Basin Oil and Gas Leasing Plan:

- BLM has determined that more than 77,000 acres of the Vermillion Basin contain wilderness characteristics. Vermillion Basin is not currently leased for oil and gas development. The DEIS proposes to allow one percent of a leased unit in the Vermillion Basin to be disturbed by oil and gas activities at one time. EPA is concerned that this plan does not demonstrate how it will protect the natural and scenic value of the Basin, which is stated as an objective of this plan (DEIS page 2-47). EPA suggests that the EIS describe the proposed project impacts and cumulative impacts analyses before making leasing decisions for the Vermillion Basin. In addition, EPA recommends that BLM fully describe its balancing of various uses, particularly in consideration of BLM's 2001 determination of the wilderness characteristics of most of Vermillion Basin and the public's significant interest in maintaining the pristine nature of this area.

Greenhouse Gas Emissions:

- The DEIS does not mention the emissions of greenhouse gases from activities on the RMPPA¹. We recommend that BLM encourage oil and gas lessees to participate in EPA's Natural GasSTAR program. Through the Program (www.epa.gov/gasstar), EPA works with companies who produce, process, transmit, and distribute natural gas to identify and promote the implementation of cost-effective technologies and practices to reduce emissions of methane, a potent greenhouse gas.

Irreversible and Irretrievable Commitment of Resources:

- The document states that surface disturbing activities, including dispersed recreation, Off Highway Vehicles (OHV) use, mineral and energy development and ROW development, can result in removing vegetation and accelerate erosion that could contribute to irreversible soil loss. (DEIS page 4-241). EPA recommends that these impacts be more fully disclosed in other areas in the document including the reclamation section, Appendix O. This section should also discuss the fragile nature of the sagebrush ecosystem and the distinct possibility that activities conducted in the RMPPA may result in irreversibly damaging Sage Grouse habitat.

ACECs: (Area of Critical Environmental Concern):

¹ Since the issuance of the April 2, 2007 Supreme Court opinion in Massachusetts et al v. EPA, 549 U.S. ____ (2007), EPA has not yet determined the path forward with respect to addressing emissions of greenhouse gases under relevant regulatory portions of the Clean Air Act. Thus, our comments on emissions here do not reflect, and should not be construed as reflecting, the type of judgment that might form the basis for a positive or negative finding under any regulatory provision of the Clean Air Act.

ACECs: (Area of Critical Environmental Concern):

- ACECs are areas where special management attention should be given to protect and to prevent irreparable damage to important values, resources, systems, or processes, or to protect life and safety from natural hazards (section 202(c)(3) of FLPMA). The preferred alternative would have 11,910 acres in Irish Canyon set aside as an ACEC. Three other areas which currently have ACECs designation (Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon) are proposed to no longer have that status. It is not clear to EPA how BLM's multiple use assessment resulted in BLM's preference to eliminate the ACEC status of these areas or what environmental impacts are associated with removing ACEC status. EPA recommends that the EIS fully explain how its balancing of the various multiple uses resulted in BLM's preference to remove the ACEC status of these three areas and the environmental impacts associated with removing the ACEC designation.

Transportation and Travel Management:

- The DEIS contains proposed decisions on which areas will be open, limited, or closed to OHV travel, although a separate travel plan will be prepared at a later date. We did not see information on potential water quality concerns associated with areas open to OHV travel. EPA recommends that this criterion be addressed in the EIS.